

Message

From: Melvin, Karen [Melvin.Karen@epa.gov]
Sent: 1/30/2020 8:10:47 PM
To: Hall, Kristen [hall.kristen@epa.gov]
CC: Esher, Diana [Esher.Diana@epa.gov]; Armstrong, Joan [Armstrong.Joan@epa.gov]; Cinti, Thomas [Cinti.Thomas@epa.gov]; Amend, Carol [amend.carol@epa.gov]
Subject: Re: PES benzene refinery data

Thx. Good point at the meeting too btw

Sent from my iPhone

On Jan 30, 2020, at 2:48 PM, Hall, Kristen <hall.kristen@epa.gov> wrote:

As requested, below is the email thread between ECAD Air and Jack Kelly. It also includes a status update from Chuck Barksdale at PES.

Kris

Kris Hall
Chief, Air Section
Enforcement & Compliance Assurance Division
Air, RCRA and Toxics Branch
US EPA Region 3
1650 Arch Street – 3ED21
Philadelphia, PA 19103
215-814-2168
Hall.Kristen@epa.gov

From: Kelly, Jack (R3 Phila.) <Kelly.Jack@epa.gov>
Sent: Thursday, January 30, 2020 1:04 PM
To: Hall, Kristen <hall.kristen@epa.gov>
Cc: Augustine, Bruce <augustine.bruce@epa.gov>
Subject: RE: PES benzene refinery data

I canceled/postponed the call/meeting tomorrow. Also let Pat O'Neill know.

Jack Kelly
On Scene Coordinator
EPA Region 3
215-514-6792 cell

From: Kelly, Jack (R3 Phila.)
Sent: Thursday, January 30, 2020 12:49 PM
To: Hall, Kristen <hall.kristen@epa.gov>
Cc: Augustine, Bruce <augustine.bruce@epa.gov>
Subject: RE: PES benzene refinery data

Ex. 5 Deliberative Process (DP)

Jack Kelly
On Scene Coordinator
EPA Region 3
215-514-6792 cell

From: Hall, Kristen <hall.kristen@epa.gov>
Sent: Thursday, January 30, 2020 12:44 PM
To: Kelly, Jack (R3 Phila.) <Kelly.Jack@epa.gov>; Augustine, Bruce <augustine.bruce@epa.gov>
Subject: RE: PES benzene refinery data

Hi Jack,

Thanks for the update. There has been a lot of 16th floor interest in PES and the current status. I think before you go, we should try to have a coordination meeting. It may not be able to happen before Friday. But I think it would be helpful for all of us (ECAD, ORC, you) to be on the same page.

That sound ok?

Thanks
Kris

Kris Hall
Chief, Air Section
Enforcement & Compliance Assurance Division
Air, RCRA and Toxics Branch
US EPA Region 3
1650 Arch Street – 3ED21
Philadelphia, PA 19103
215-814-2168
Hall.Kristen@epa.gov

From: Kelly, Jack (R3 Phila.) <Kelly.Jack@epa.gov>
Sent: Thursday, January 30, 2020 12:17 PM
To: Augustine, Bruce <augustine.bruce@epa.gov>
Cc: Hall, Kristen <hall.kristen@epa.gov>
Subject: RE: PES benzene refinery data

Bruce, Kris,

I need to get back to Chuck. Do you prefer I not have this meeting/call tomorrow?
I was going to stop over there at Chuck's convenience but if you folks prefer to address without my involvement let me know.

Ex. 5 Deliberative Process (DP)

Jack Kelly
On Scene Coordinator
EPA Region 3
215-514-6792 cell

From: Augustine, Bruce <augustine.bruce@epa.gov>
Sent: Thursday, January 30, 2020 8:17 AM
To: Kelly, Jack (R3 Phila.) <Kelly.Jack@epa.gov>
Cc: Hall, Kristen <hall.kristen@epa.gov>
Subject: RE: PES benzene refinery data

Jack,

Ex. 5 Attorney Work Product (AWP)

From: Kelly, Jack (R3 Phila.) <Kelly.Jack@epa.gov>
Sent: Wednesday, January 29, 2020 4:41 PM
To: BARKSDALE JR, CHARLES D <CHARLES.BARKSDALE@pes-companies.com>
Cc: Augustine, Bruce <augustine.bruce@epa.gov>
Subject: Re: PES benzene refinery data

Ex. 5 Attorney Work Product (AWP)

Jack
Jack Kelly
On Scene Coordinator
EPA Region III, Philadelphia
[215-514-6792](tel:215-514-6792) (cell)
[215-814-3112](tel:215-814-3112) (office)

On Jan 29, 2020, at 4:20 PM, BARKSDALE JR, CHARLES D <CHARLES.BARKSDALE@pes-companies.com> wrote:

Jack,

Bruce and I have not discussed these results. I have had some discussions with Patrick O'Neill and Ramesh Mahadevan of the City.

I'll give you some general information, but it would be best to discuss.

We are continuing to conduct the passive monitoring.

Our emissions are down but not at background since we still have benzene in storage tanks in minor concentration in crude and gasoline. We have a few chemical tanks at higher concentration and we have emptied all but one "pure" benzene tank associated with our chemical operations. Many of the gasoline tanks are also empty now. Most of the emptying of tanks has occurred in the past 4-6 weeks.

In general, major sources of benzene emissions were the benzene tanks (on the fenceline) and the two Girard Point oil-water separators (on the fence line). The benzene tanks are near monitoring points 7 and 8. The 2 Separator is near monitoring point 14 and the 4 Separator is near monitoring point 16. More information about the separators and corrective actions have been provided previously to EPA.

We've had a couple of episodic events and one extended off-site source that caused elevated conditions. In May 2019, we loaded a low RVP heavy reformat into a barge at the Point Breeze refinery. The adjacent monitor (18) showed elevated benzene (189 ug/m3). This is an activity allowed by our permit but we didn't realize would cause such elevated readings. This is also a rare activity. As I'm sure you remember, we had a problem with a gasoline roof in July when the floating roof sank. We put foam on the roof to limit emissions and odors, but the benzene result for the nearby monitor (no. 1) on 26th Street was very elevated (189 ug/m3).

The off-site source is one you remember as it was related to an underground oil release impacting the river from a terminal across the river from the refinery. The emissions from the oil in the river (boomed in against their bulkhead) and from their recovery tank impacted our monitors significantly for several months (mostly point 13). I don't think we have any other significant off-site sources and this one appears to have been stopped or controlled.

Let me know when you'd like to discuss in more detail. I'm generally available the rest of this week and next week.

Thanks,

Chuck Barksdale
Environmental Director
215-339-2074 (office)
610-299-6260 (cell)

From: Kelly, Jack (R3 Phila.) [<mailto:Kelly.Jack@epa.gov>]

Sent: Wednesday, January 29, 2020 1:55 PM

To: BARKSDALE JR, CHARLES D <CHARLES.BARKSDALE@pes-companies.com>

Cc: Augustine, Bruce <augustine.bruce@epa.gov>

Subject: PES benzene refinery data

Hi Chuck,

I am sure you saw or heard about the article in the weblink below.

<https://www.eenews.net/stories/1062097771>

It required a response from EPA and became a topic at a recent Philly Air Pollution Control Board meeting.

Bruce may have contacted you already but, if not,.....and even if so..... can I either stop by or you give me a call to discuss the following?

If Bruce did not contact you, maybe he and I can coordinate a call or meeting with you.

I was trying to get info on the following:

- The status of operations and emissions at the plant.
- Do you continue to perform benzene sampling?
- Are you able to identify other potential non-PES sources in the area? (If not, I understand.)
- I apologize but I have not had a chance to go through all of the data as yet. Can you identify which stations tend to have the higher readings and why? I will eventually get through the data.

You can best reach me on my cell # any time.

Thank you!

Jack Kelly
On Scene Coordinator
EPA Region 3
215-514-6792 cell